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December 1, 1992

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N. W.
Washington, D. C. 20554

Re: MM Docket No. 92-260
Comments of Americable International, Inc.

Dear Ms. Searcy:

Transmitted herewith on behalf of Americable International, Inc., are an original and nine copies of its Comments in the above-referenced rule making proceeding.

Should you have any questions, please contact the undersigned.

Very truly yours,



James E. Meyers
Counsel for
Americable International, Inc.

Enclosures

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**Before the
Federal Communications Commission
Washington, D.C. 20554**

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Implementation of the) MM Docket No. 92-260
Cable Television Consumer)
Protection and Competition)
Act of 1992)
)
Cable Home Wiring)

To: The Commission

COMMENTS OF AMERICABLE INTERNATIONAL, INC.

Americable International, Inc. ("Americable"), through undersigned counsel, submits its comments to the above-captioned Notice of Proposed Rule Making, FCC 92-500 (released November 6, 1992 ("Notice")). Americable is a multiple cable system operator serving primarily military reservations.

In the Notice the Commission asked for comment as to whether its home wiring rules would need to be tailored differently for multiple building settings such as military facilities. Notice at paragraph 3. Because of the unique nature in which cable television is provided to military installations, the Commission should carefully consider military installations in fashioning its rules.

Military housing is either single family or multi-dwelling. Dependents of personnel stationed to the base typically occupy the single family dwellings, and individually subscribe to cable. Multi-dwelling facilities

are barracks, usually called BOQ's ("Bachelor Officer Quarters") or BEQs ("Bachelor Enlisted Quarters"). However, individual residents do not subscribe to cable. Rather, the federal government or fund activity will requisition cable for the barracks.

In the case of both single and multi dwelling units, the residents are highly transient and none own the premises. Rather, the federal government owns all facilities. Personnel are stationed on a temporary basis, frequently not longer than two years; the franchising authority (usually the base commander) is stationed at the facility usually not longer than four years.

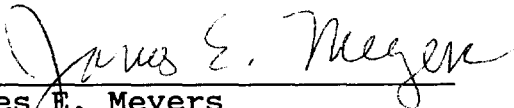
Accordingly, any form of home-wiring subscriber-ownership would be akin to the franchising authority obtaining ownership to home wiring, which would be inappropriate and contrary to the purpose of amended section 624, without special safeguards. To thus avoid any potential for abuse, the regulations should ensure that cable operators receive, at a minimum, compensation for home wiring reflecting the cost of the wiring adjusted for inflation. The regulations should also permit the cable operator to either remove or abandon its home wiring if the military facility does not acquire it.

Accordingly, the regulations under consideration should contain special provisions for military facilities discussed above.

Respectfully submitted,

AMERICABLE INTERNATIONAL, INC.

By: _____


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Its Counsel

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